

EXHIBIT A

**TO THE DECLARATION OF ADA K. WONG IN SUPPORT
OF PLAINTIFF'S MOTION TO COMPEL DISCOVERY
RESPONSES AND FOR ATTORNEY'S FEES**

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JILLIAN HORMAN, an individual,

Plaintiff,

v.

SUNBELT RENTALS, INC., a Washington
State Entity; "DOE(S) 1-100", employees of
SUNBELT RENTALS, INC.; and
"CORPORATION(S) XYZ 1-100,"

Defendants.

Case No. 2:20-cv-00564-TSZ

**PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO
DEFENDANT SUNBELT RENTALS,
INC.**

TO: SUNBLET RENTALS, INC., Defendant

AND TO: SHANE P. CRAMER, PATRICIA J. HILL and YASH B. DAVE, Counsel for
Defendant

SET NO.: ONE

Plaintiff Jillian Horman, in her individual capacity herein, hereby serves these
Interrogatories upon Defendant Sunbelt Rentals, Inc. These Interrogatories are served upon
you in accordance with Rules 26, 33, 34 and 37 of the Federal Rules of Civil Procedure. Your
attention is directed to Rule 26(e) regarding your continuing duty to supplement your answers
herein. Answer in the spaces provided (using additional sheets as needed), and verify your

1 employees for the last five (5) years.

2 **ANSWER:**

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5 **INTERROGATORY NO. 14:**

6 Please identify all trainings, materials, handbooks, policies, procedures, manuals,
7 guidelines, bulletins, notes, memoranda, letters, and e-mails in effect for Defendant SUNBELT
8 RENTALS, INC.'s employees, agents, independent contractors, staff, and/or personnel in the
9 department/division/group in which Plaintiff worked, including the Driver 1 and/or Dispatcher
10 job positions for the last five (5) years.

11 **ANSWER:**

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14 **INTERROGATORY NO. 15:**

15 If Defendant SUNBELT RENTALS, INC.'s (including its employees, agents,
16 independent contractors, staff, and/or personnel) had any communications, in any form, with
17 any person (excluding its attorneys), regarding the matters alleged in Plaintiff's Complaint,
18 state:

- 19 (a) The identity of the person(s) with whom such communications were made;
20 (b) What was said to the person(s) identified in subsection (a); and
21 (c) The date and form (written or oral) of each such communications.

22 **ANSWER:**

1 **ANSWER:**

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4 **INTERROGATORY NO. 18:**

5 Identify all employees of Defendant SUNBELT RENTALS, INC. that have requested
6 a disability accommodation, the person who handled the request and/or finding of reasonable
7 accommodation, and the outcome of any accommodation provided (or not provided with the
8 reasons for such) for the last five (5) years.

9 **ANSWER:**

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12 **INTERROGATORY NO. 19:**

13 Please identify all individuals you contend are speaking agents of Defendant
14 SUNBELT RENTALS, INC. and/or individuals you contend to have authority to bind
15 Defendant SUNBELT RENTALS, INC. This includes but is not limited to all corporate
16 officers, owners, and board of directors for Defendant SUNBELT RENTALS, INC. For all
17 individuals identified, please provide their position title(s), dates of employment, dates in said
18 position titles, and a description of their primary duties and responsibilities.

19 **ANSWER:**

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22 **INTERROGATORY NO. 20:**

23 If Defendant SUNBELT RENTALS, INC. contends it conducted (an) investigation(s)

1 into Plaintiff's claims, at any time, state when Defendant SUNBELT RENTALS, INC. first
 2 learned of the matter which was investigated; whether Defendant SUNBELT RENTALS, INC.
 3 admits there was a prior (uninvestigated) complaint of any type from Plaintiff; the nature of
 4 each such (investigated or uninvestigated) complaint; who was responsible for conducting any
 5 investigation; what was the content of any investigation, including identification of documents
 6 reviewed and witnesses interviewed, as well as any other aspects of the investigation; what
 7 was the outcome or final decision of the investigation; and what, if any, action was taken as a
 8 result of the investigation, and/or of the complaint or claim which led to it.

9 **ANSWER:**

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12 **INTERROGATORY NO. 21:**

13 If Defendant SUNBELT RENTALS, INC. has retained a private investigator to contact
 14 witnesses, please identify the investigator, the witnesses contacted (whether successful or not),
 15 the dates of such contact, the method of communication (in person, e-mail, text, phone, etc.),
 16 and whether a written or oral statement was obtained and/or provided (including drafts and
 17 documents, whether signed or not).

18 **ANSWER:**

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21 **INTERROGATORY NO. 22:**

22 Was Plaintiff ever disciplined to any extent up to and including termination for any
 23 reason during the term of her employment with Defendant SUNBELT RENTALS, INC.? If

CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury under the laws of the State of Washington that I am now and at all times herein mentioned, a citizen of the United States, a resident of the State of Washington, over the age of eighteen years, not a party to or interested in the above-entitled action, and competent to be a witness herein.

On June 16, 2020, I caused a copy of the foregoing to be served on the parties listed below in the manner specified below:

Shane P. Cramer Harrigan Leyh Farmer & Thomsen LLP 999 Third Avenue, Suite 4400 Seattle, WA 98104 E-mail: shanec@harriganleyh.com <i>Attorneys for Defendant Sunbelt Rentals, Inc.</i>	<input type="checkbox"/>	VIA FACSIMILE
	<input type="checkbox"/>	VIA FIRST CLASS U.S. MAIL
	<input type="checkbox"/>	VIA MESSENGER/HAND DELIVERY
	<input checked="" type="checkbox"/>	VIA E-MAIL/E-FILE <i>Per 5/21/2020 Stipulation</i> <i>Regarding Electronic Service</i>
Patricia J. Hill Yash B. Dave Smith, Gambrell & Russell, LLP 50 North Laura Street, Suite 2600 Jacksonville, FL 32202 E-mail: pjhill@sgrlaw.com E-mail: ydave@sgrlaw.com E-mail: cmars@sglaw.com <i>Pro hac vice Counsel for Defendant Sunbelt Rentals, Inc.</i>	<input type="checkbox"/>	VIA FACSIMILE
	<input type="checkbox"/>	VIA FIRST CLASS U.S. MAIL
	<input type="checkbox"/>	VIA MESSENGER/HAND DELIVERY
	<input checked="" type="checkbox"/>	VIA E-MAIL/E-FILE <i>Per 5/21/2020 Stipulation</i> <i>Regarding Electronic Service</i>

Dated June 16, 2020, at Mountlake Terrace, Washington.

/s/ Kaila A. Eckert

Kaila A. Eckert, Paralegal